

REMARKS

Claims 1 - 9, 19 - 32, 38 and 45 - 46 remain active in this application. Claims 10 - 18, 33 - 37 and 39 - 44 have previously been canceled. Claims 1, 23, 31, 32 and 38 have been amended to improve form, clarity and accuracy in response to criticisms by the Examiner. Support for the amendments of the claims is found throughout the application, and in particular regard to claim 1, on page 21, lines 14 - 18. No new matter has been introduced into the application. The indication of allowability of the subject matter of claims 19 - 32 and 38 is noted with appreciation.

The Examiner has objected to the formal drawings submitted on February 26, 2004; the Examiner making specific criticisms of Figures 3A, 14A - 14 B and 17A - 17B and raising questions in regard to the depictions of Figures 18 and 19. This objection is respectfully traversed as moot in view of the amendments made above and the concurrently filed replacement drawing sheets.

In regard to Figures 3A and 17B, previously submitted and approved revisions have been included in the replacement drawing sheets. Specifically, reference numeral 74 has been relocated in Figure 3A and illustration of a terminal has been supplied in Figure 17B.

In regard to Figures 14A and 14B, upon review in light of the Examiner's criticisms, it was discovered that reference numerals 234 and 236 were reversed in Figure 14B as originally filed, as compared with Figure 14A. This revision can be verified by comparison to Figures 13A and 13B since Figures 14A and 14B are disclosed in the paragraph bridging pages 19 and 20 are similar to the circuit/device of Figures 13A and 13B but substituting PMOS transistors for NMOS transistors. Accordingly, approval has been requested, above, for an appropriate correction. The depiction of transistors

234 and 236 has been previously approved and such revisions have been made in regard to the depictions of the transistors as correctly identified and in a manner consistent between Figures 14A and 14B.

In regard to Figures 18 and 19, the shaded triangular shape questioned by the Examiner is a clear depiction of a diode. The rectangle in Figure 18 is a generic depiction of a circuit for injecting current into the thyristor gate as disclosed at page 22, lines 14 - 16; Figure 18 illustrating the addition of circuit elements and connections which allows formation of a three-terminal device in accordance with the circuit arrangement of Figure 17A - 17D which is a four-terminal device.

In summary, the foregoing is believed to be a full and complete answer to the Examiner's criticisms and questions in the asserted objection to the formal drawings. Accordingly, reconsideration and withdrawal of the objection to the drawings is respectfully requested. If, upon reconsideration, any issue is seen to remain, it is respectfully requested that the Examiner contact the undersigned by telephone at the number given below in order to expeditiously resolve the same.

The Examiner has objected to claims 23, 32 and 38 due to inexact antecedent language correspondence. This objection is respectfully traversed as being moot in view of the revisions of these claims made above which directly address each criticism stated by the Examiner. Accordingly, reconsideration and withdrawal of this objection is respectfully requested.

Claims 1 - 9, 26, 31, 32, 38 and 45 have been rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement of that Statute. This ground of rejection is respectfully traversed for the reasons of record and the further remarks below.

In regard to claim 1, the Examiner asserts that the specification does not disclose a thyristor device package including means for injecting current into the thyristor gate for triggering the thyristor into a latching state and a first voltage applied to the gate terminal of the first MOS transistor causes a forward current to flow between the cathode and anode of the thyristor device. This statement of the rejection in regard to claim 1 is taken as an assertion that the Examiner does not find verbatim support for some of the terminology of the recitation but it is not particularly clear at what point in the relatively lengthy recitation the Examiner believes verbatim support to be lacking. It is also respectfully submitted that a requirement for verbatim support is not required by the Statute but only enablement and a description of the best mode of carrying out the invention. Lack of enablement or failure to disclose the best mode has not been raised by the Examiner and it is believed to be abundantly evident that the specification complies with the Statute in regard to these standards.

On the contrary, the Examiner's attention is respectfully called to page 21, lines 14 - 18 where substantially verbatim support is found for the recitation noted by the Examiner. This disclosure is made in regard to the embodiment of the invention illustrated in Figures 17A - 17D which is clearly a thyristor device package. Nevertheless, the word "forward" has been deleted from claim 1 since that word does not appear in the noted passage of page 21 and is, in any event, unnecessary to a distinctive definition of the subject matter of the invention. Therefore, it is respectfully submitted that the Examiner is not only substantively incorrect in regard to the assertions regarding the disclosure, but verbatim support is, in fact, provided for the salient terminology of the

recitation the Examiner questions in the statement of the rejection in regard to claim 1.

Similarly, the Examiner's statement of the rejection in regard to claim 31 appears to be of a similar nature. Accordingly, the term "connection" has been substituted for "second feedback path" in claim 31. Verbatim support for salient terminology of claim 38 is found in the passage noted in regard to claim 1.

In regard to claims 2 - 4 and 6 - 9 the Examiner admits that figures 17A - 17D show a thyristor device package but the Examiner asserts that the specification does not disclose particular structures recited in these dependent claims in connection with a thyristor device package. The Examiner's position in this regard appears to derive from the fact that many of the circuits in accordance with the invention are disclosed in connection with an integrated solid-state device rather than a package comprised of discrete devices. However, it is respectfully pointed out that an equivalent circuit of discrete devices is disclosed, explained and illustrated for each and every integrated solid-state device circuit in the specification. Thus, for example, the "floating ohmic contact" of claim 2 and illustrated in Figure 1A as a strap on the device surface also appears as a discrete connection in Figure 1B, contrary to the Examiner's assertion in response to previously submitted remarks. A strap connection of claims 3 and 8 between discrete devices as well as the connection recited in claim 26, also appear to be well-supported by the disclosure at page 21, lines 8 - 9, just as the inclusion of additional transistors of claim 4 is well-supported by for example, Figure 4B. In regard to claims 5 - 7, the substitution of PMOS transistors for NMOS transistors is well supported by the comparative discussion of Figures 13A - 13B and 14A - 14B. Likewise, the inclusion of a diode is well supported, for example, by Figures 10B, 11B, 12B, etc.

The capacitor connection of claim 32 is well supported by the illustration of figures 18 and 19 and the discussion thereof on page 22 which is clearly in regard to a thyristor device package.

Accordingly, it is respectfully submitted that this ground of rejection is substantively in error as well as seeking to apply a standard not supported by the state relied upon or legal precedent. Therefore, reconsideration and withdrawal of this ground of rejection is respectfully requested.

Claims 23 - 32 have been rejected under 35 U.S.C. §112, second paragraph, as being indefinite; the Examiner questioning particular passages of claims 23, 26 - 30 and 32. This ground of rejection is also respectfully traversed, particularly as being moot in view of amendments made above.

Initially, it is respectfully submitted that no ambiguity is engendered by the language of the claims and that the language noted by the Examiner presents no impediment to determination of the scope of the claimed subject matter. Therefore, it is respectfully submitted that the claims are fully in compliance with well-accepted standards of definiteness as enunciated by the M.P.E.P. since the scope of the claimed subject matter can be readily determined.

Nevertheless, to expeditiously resolve this issue, claim 23 has been amended to refer to "respective ones of" the switching devices of the first and second pluralities of switching devices, in direct response to the Examiner's questions. In this regard it is respectfully submitted to be unnecessary to refer to "each" of the switching devices as the Examiner seems to suggest as an acceptable alternative.

In regard to claims 26 - 30, the Examiner's criticism is not understood since the language correspondence appears to be exact, even in the Examiner's statement of the rejection. That is, the

Examiner appears to be questioning whether or not the claim recites the exact language contained therein. Applicant therefore respectfully requests that, should the Examiner persist in this criticism, that the undersigned be contacted by telephone at the number given below to clarify the issue so that the issue can be expeditiously resolved.

In regard to claim 32, a typographical revision has been made which appears to answer the Examiner's criticism. However, this revision is abundantly evident in the claim and does not compromise a determination of the scope of the claim. Therefore, it is respectfully submitted that rejection of the claim on such a basis is unjustified and possibly confuses the issue the Examiner seeks to address. Again, the Examiner is respectfully requested to contact the undersigned to clarify the issue if any other or additional revision is believed to be necessary.

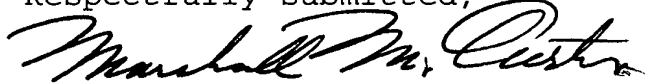
In summary, it is respectfully submitted that the rejection of claims 23 - 32 as being indefinite is clearly in error and unjustified and, in any event, is believed to have been rendered moot by the amendments to claim 23 made above. Therefore, reconsideration and withdrawal of this ground of rejection is respectfully requested.

Since all rejections, objections and requirements contained in the outstanding official action have been fully answered and shown to be in error and/or inapplicable to the present claims, it is respectfully submitted that reconsideration is now in order under the provisions of 37 C.F.R. §1.111(b) and such reconsideration is respectfully requested. Upon reconsideration, it is also respectfully submitted that this application is in condition for allowance and such action is therefore respectfully requested.

If an extension of time is required for this response to be considered as being timely filed, a

conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Marshall M. Curtis", is written over the typed name.

Marshall M. Curtis
Reg. No. 33,138

Whitham, Curtis & Christofferson, P. C.
11491 Sunset Hills Road, Suite 340
Reston, Virginia 20190

(703) 787-9400
Customer Number: **30743**

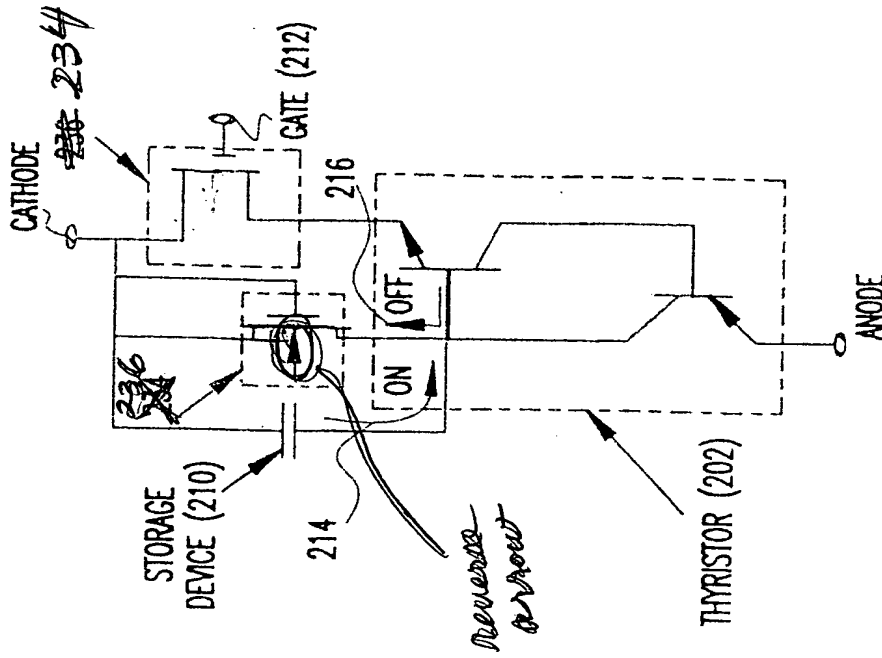


FIG. 14B

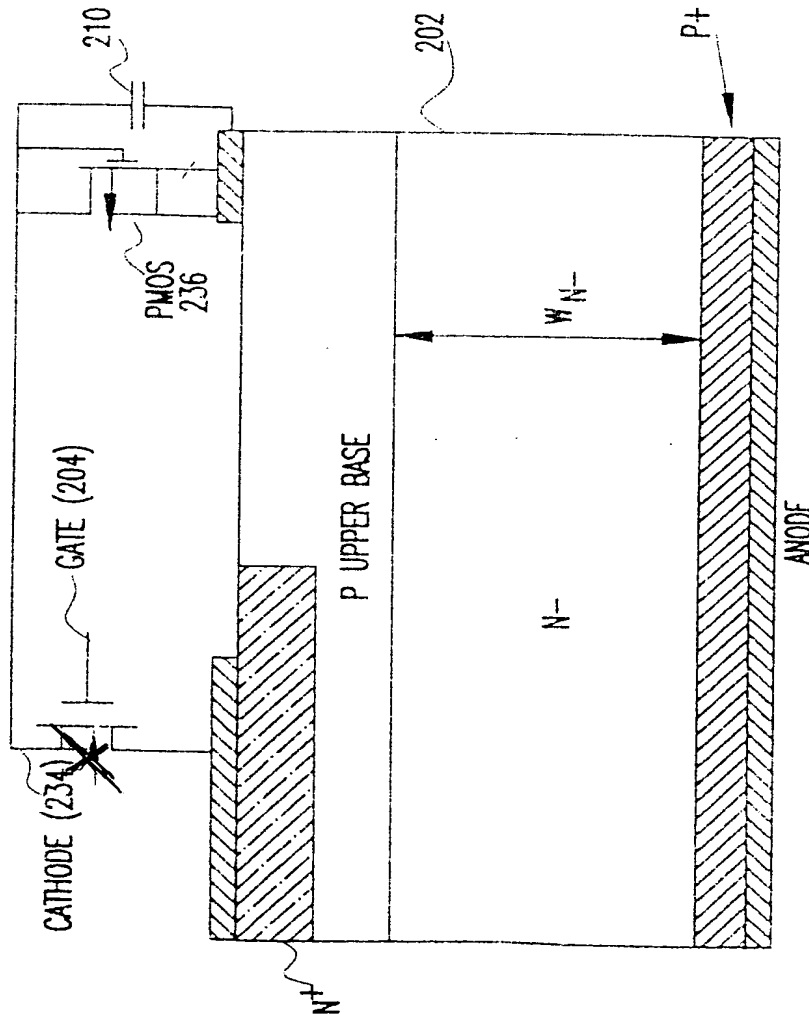


FIG. 14A